1	Francis O. Scarpulla (41059)	
	Craig C. Corbitt (83251)	
2	Judith A. Zahid (215418)	
2	Patrick B. Clayton (240191)	
3	Qianwei Fu (242669)	
4	Heather T. Rankie (268002) ZELLE HOFMANN VOELBEL & MASON LL	D
4	44 Montgomery Street, Suite 3400	
5	San Francisco, CA 94104	
_	Telephone: (415) 693-0700	
6	Facsimile: (415) 693-0770	
	fscarpulla@zelle.com	
7		
	Joseph M. Alioto (42680)	
8	Theresa D. Moore (99978)	
	ALIOTO LAW FIRM	
9	225 Bush Street, 16th Floor	
10	San Francisco, CA 94104 Telephone: (415) 434-8900	
10	Facsimile: (415) 434-8900	
11	imalioto@aliotolaw.com	
12	Co-Lead Class Counsel for Indirect-Purchaser P	laintiffs
12		
13	UNITED STATES I	NETDICT COUDT
14	UNITED STATES	DISTRICT COURT
17	NORTHERN DISTRIC	CT OF CALIFORNIA
ا ــ ا		or or engar ora (m)
15		
15	SAN FRANCIS	CO DIVISION
15 16		
16	IN RE TFT-LCD (FLAT PANEL)	) Case No. 3:07-MD-1827 SI
16 17	IN RE TFT-LCD (FLAT PANEL)	) Case No. 3:07-MD-1827 SI
16	IN RE TFT-LCD (FLAT PANEL) ANTITRUST LITIGATION	Case No. 3:07-MD-1827 SI MDL No. 1827
16 17 18	IN RE TFT-LCD (FLAT PANEL)	Case No. 3:07-MD-1827 SI  MDL No. 1827  [PROPOSED] ORDER RE:
16 17	IN RE TFT-LCD (FLAT PANEL) ANTITRUST LITIGATION  This Document Relates to:	Case No. 3:07-MD-1827 SI MDL No. 1827  [PROPOSED] ORDER RE: DISTRIBUTION FROM ESCROW
16 17 18	IN RE TFT-LCD (FLAT PANEL) ANTITRUST LITIGATION	Case No. 3:07-MD-1827 SI  MDL No. 1827  [PROPOSED] ORDER RE:
16 17 18 19 20	IN RE TFT-LCD (FLAT PANEL) ANTITRUST LITIGATION  This Document Relates to:	Case No. 3:07-MD-1827 SI MDL No. 1827  [PROPOSED] ORDER RE: DISTRIBUTION FROM ESCROW FUNDS FOR CLAIMS
16 17 18 19	IN RE TFT-LCD (FLAT PANEL) ANTITRUST LITIGATION  This Document Relates to: All Indirect-Purchaser Actions;	Case No. 3:07-MD-1827 SI MDL No. 1827  [PROPOSED] ORDER RE: DISTRIBUTION FROM ESCROW FUNDS FOR CLAIMS ADMINISTRATION
16 17 18 19 20 21	IN RE TFT-LCD (FLAT PANEL) ANTITRUST LITIGATION  This Document Relates to: All Indirect-Purchaser Actions;  State of Missouri, et al. v. AU Optronics Corporation, et al., Case No. 10-cv-3619;	Case No. 3:07-MD-1827 SI MDL No. 1827  [PROPOSED] ORDER RE: DISTRIBUTION FROM ESCROW FUNDS FOR CLAIMS
16 17 18 19 20	IN RE TFT-LCD (FLAT PANEL) ANTITRUST LITIGATION  This Document Relates to: All Indirect-Purchaser Actions;  State of Missouri, et al. v. AU Optronics Corporation, et al., Case No. 10-cv-3619;  State of Florida v. AU Optronics Corporation,	Case No. 3:07-MD-1827 SI MDL No. 1827  [PROPOSED] ORDER RE: DISTRIBUTION FROM ESCROW FUNDS FOR CLAIMS ADMINISTRATION
16 17 18 19 20 21 22	IN RE TFT-LCD (FLAT PANEL) ANTITRUST LITIGATION  This Document Relates to: All Indirect-Purchaser Actions;  State of Missouri, et al. v. AU Optronics Corporation, et al., Case No. 10-cv-3619;	Case No. 3:07-MD-1827 SI MDL No. 1827  [PROPOSED] ORDER RE: DISTRIBUTION FROM ESCROW FUNDS FOR CLAIMS ADMINISTRATION
16 17 18 19 20 21	IN RE TFT-LCD (FLAT PANEL) ANTITRUST LITIGATION  This Document Relates to: All Indirect-Purchaser Actions;  State of Missouri, et al. v. AU Optronics Corporation, et al., Case No. 10-cv-3619;  State of Florida v. AU Optronics Corporation, et al., Case No. 10-cv-3517; and	Case No. 3:07-MD-1827 SI MDL No. 1827  [PROPOSED] ORDER RE: DISTRIBUTION FROM ESCROW FUNDS FOR CLAIMS ADMINISTRATION
16 17 18 19 20 21 22 23	IN RE TFT-LCD (FLAT PANEL) ANTITRUST LITIGATION  This Document Relates to: All Indirect-Purchaser Actions;  State of Missouri, et al. v. AU Optronics Corporation, et al., Case No. 10-cv-3619;  State of Florida v. AU Optronics Corporation, et al., Case No. 10-cv-3517; and  State of New York v. AU Optronics	Case No. 3:07-MD-1827 SI MDL No. 1827  [PROPOSED] ORDER RE: DISTRIBUTION FROM ESCROW FUNDS FOR CLAIMS ADMINISTRATION
16 17 18 19 20 21 22	IN RE TFT-LCD (FLAT PANEL) ANTITRUST LITIGATION  This Document Relates to: All Indirect-Purchaser Actions;  State of Missouri, et al. v. AU Optronics Corporation, et al., Case No. 10-cv-3619;  State of Florida v. AU Optronics Corporation, et al., Case No. 10-cv-3517; and	Case No. 3:07-MD-1827 SI MDL No. 1827  [PROPOSED] ORDER RE: DISTRIBUTION FROM ESCROW FUNDS FOR CLAIMS ADMINISTRATION
16 17 18 19 20 21 22 23	IN RE TFT-LCD (FLAT PANEL) ANTITRUST LITIGATION  This Document Relates to: All Indirect-Purchaser Actions;  State of Missouri, et al. v. AU Optronics Corporation, et al., Case No. 10-cv-3619;  State of Florida v. AU Optronics Corporation, et al., Case No. 10-cv-3517; and  State of New York v. AU Optronics	Case No. 3:07-MD-1827 SI MDL No. 1827  [PROPOSED] ORDER RE: DISTRIBUTION FROM ESCROW FUNDS FOR CLAIMS ADMINISTRATION
16 17 18 19 20 21 22 23 24 25	IN RE TFT-LCD (FLAT PANEL) ANTITRUST LITIGATION  This Document Relates to: All Indirect-Purchaser Actions;  State of Missouri, et al. v. AU Optronics Corporation, et al., Case No. 10-cv-3619;  State of Florida v. AU Optronics Corporation, et al., Case No. 10-cv-3517; and  State of New York v. AU Optronics	Case No. 3:07-MD-1827 SI MDL No. 1827  [PROPOSED] ORDER RE: DISTRIBUTION FROM ESCROW FUNDS FOR CLAIMS ADMINISTRATION
16 17 18 19 20 21 22 23 24	IN RE TFT-LCD (FLAT PANEL) ANTITRUST LITIGATION  This Document Relates to: All Indirect-Purchaser Actions;  State of Missouri, et al. v. AU Optronics Corporation, et al., Case No. 10-cv-3619;  State of Florida v. AU Optronics Corporation, et al., Case No. 10-cv-3517; and  State of New York v. AU Optronics	Case No. 3:07-MD-1827 SI MDL No. 1827  [PROPOSED] ORDER RE: DISTRIBUTION FROM ESCROW FUNDS FOR CLAIMS ADMINISTRATION
16 17 18 19 20 21 22 23 24 25 26	IN RE TFT-LCD (FLAT PANEL) ANTITRUST LITIGATION  This Document Relates to: All Indirect-Purchaser Actions;  State of Missouri, et al. v. AU Optronics Corporation, et al., Case No. 10-cv-3619;  State of Florida v. AU Optronics Corporation, et al., Case No. 10-cv-3517; and  State of New York v. AU Optronics	Case No. 3:07-MD-1827 SI MDL No. 1827  [PROPOSED] ORDER RE: DISTRIBUTION FROM ESCROW FUNDS FOR CLAIMS ADMINISTRATION
16 17 18 19 20 21 22 23 24 25	IN RE TFT-LCD (FLAT PANEL) ANTITRUST LITIGATION  This Document Relates to: All Indirect-Purchaser Actions;  State of Missouri, et al. v. AU Optronics Corporation, et al., Case No. 10-cv-3619;  State of Florida v. AU Optronics Corporation, et al., Case No. 10-cv-3517; and  State of New York v. AU Optronics	Case No. 3:07-MD-1827 SI MDL No. 1827  [PROPOSED] ORDER RE: DISTRIBUTION FROM ESCROW FUNDS FOR CLAIMS ADMINISTRATION
16 17 18 19 20 21 22 23 24 25 26	IN RE TFT-LCD (FLAT PANEL) ANTITRUST LITIGATION  This Document Relates to: All Indirect-Purchaser Actions;  State of Missouri, et al. v. AU Optronics Corporation, et al., Case No. 10-cv-3619;  State of Florida v. AU Optronics Corporation, et al., Case No. 10-cv-3517; and  State of New York v. AU Optronics	Case No. 3:07-MD-1827 SI MDL No. 1827  [PROPOSED] ORDER RE: DISTRIBUTION FROM ESCROW FUNDS FOR CLAIMS ADMINISTRATION

[PROPOSED] ORDER RE: DISTRIBUTION FROM ESCROW FUNDS FOR CLAIMS ADMINISTRATION

WHEREAS, on December 27, 2011, the Court granted final approval to settlements between the Indirect-Purchaser Plaintiffs ("IPPs") and the States of Arkansas, California, Florida, Michigan, Missouri, New York, West Virginia, and Wisconsin ("Settling States") on the one hand, and defendants Chimei, Chunghwa, Epson, HannStar, Hitachi, Samsung and Sharp, as identified in the respective Settlement Agreements, and inclusive of related entities also identified in the respective Settlement Agreements (collectively, "Group-I Settling Defendants"), on the other hand; and

WHEREAS, on July 30, 2012, the Court granted preliminary approval to the settlements between IPPs and the Settling States, and defendants AUO, LG and Toshiba, as identified in the respective Settlement Agreements (collectively, "Group-II Settling Defendants" and with the Group-I Settling Defendants referred to hereafter as "All Settling Defendants"), on the other hand; and

WHEREAS, the Settlement Agreements with All Settling Defendants provide that the costs of administration of the claims process shall be paid from the Settlement Fund of each Settling Defendant, *pro rata*, based on each Settling Defendant's Settlement Amount; and

WHEREAS, the cost of claims administration invoiced by Rust Consulting is \$62,211.72 (see Exhibit 1 attached hereto); and

WHEREAS, pursuant to the Settlement Agreements the following amounts may be deducted from each Settling Defendant's Settlement Fund to pay such costs of claims administration:

Chin	nei	\$6,340.06
Chur	nghwa	\$305.01
Epso	n	\$163.86
Hanı	ıStar	\$1,474.72
Hitad	chi	\$2,240.96
Same	sung	\$13,798.56
Shar	p	\$6,640.56
AUC	)	\$9,285.28

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1	LG \$20,755.34
2	<u>Toshiba</u> \$1,207.37
3	TOTAL \$62,211.72
4	WHEREAS, Well Fargo Bank, N.A. has informed the parties that it requires an order
5	from the Court before it will distribute payment for these additional costs;
6	THEREFORE, IT IS HEREBY ORDERED that Wells Fargo Bank, N.A. shall wire
7	\$62,211.72 to the following account:
8	Bank of Texas
9	ABA/Routing # 111014325
10	Account # 8093434387
11	Account Name: Rust Consulting
12	Reference # 128325
13	Federal Tax ID # 41-1813634
14	Bank Contact: Mayra Landeros, (214) 987-8817
15	The balance of funds in the demand-deposit account, if any, shall be retained for
16	additional costs as they are incurred.
17	
18	IT IS SO ORDERED.
19	
20	Dated: 6/25, 2014 Hon. Susan Illston
21	United States District Judge
22	
23	
24	
25	
26	
27	3255362v1
28	

# EXHIBIT 1

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# **Invoice**

625 MARQUETTE AVENUE, SUITE 880 MINNEAPOLIS, MN 55402 P 612.359.2000 I F 612.359.2050 WWW.RUSTCONSULTING.COM FEDERAL ID #: 41-1813634

DATE: 06/12/14
INVOICE #: 14-8348
MATTER #: 8292

TO: Francis O. Scarpulla

Zelle Hofmann Voelbel & Mason LLP

44 Montgomery Street

**Suite 3400** 

San Franciso, CA 94104

fscarpulla@zelle.com

jdc@coopkirk.com

#### **PROJECT**

#### LCD Indirect

#### May 2014 Claims Administration Services

Project Database	\$ 702.10
Project Management	7,786.00
Technical Consulting	90.50
Website Modification	115.40
Document Receipting	437.20
Claim Forms Submitted (233 @ \$0.15 each)	34.95
Scanning	414.71
Correspondence/Admin Mail	3,692.00
Data Capture	4,320.30
Claims Validation & Audits	33,514.00
Deficiency Claim Processing	7,774.90
Mailroom & Data Capture Management	43.45
Call Center Support	 1,057.60
SUBTOTAL	59,983.11
Expenses: Other Charges and Out-of-Pocket Costs	
Call Center/Telecommunications	1,517.59
Postage/Federal Express	201.97
Shredding/Storage	132.75
Photocopies/Faxing/Printing	70.30
Address Traces	6.00
Website Hosting	300.00
SUBTOTAL	2,228.61
TOTAL INVOICE	\$ 62,211.72

#### **PAYMENT TERMS: NET DUE UPON RECEIPT**

**WIRE INFORMATION** 

ACCOUNT #: 8093434387

ABA/ROUTING # WIRE or ACH: 111014325
BANK: BANK OF TEXAS, DALLAS, TX 75225
BANK CONTACT: MAYRA LANDEROS 214.987.8817

REFERENCE: INVOICE NUMBER

RUST

PAYMENT MAILING ADDRESS:

P O BOX 142589 DRAWER #9051 Irving, TX 75014-2589

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Inv# 148348 Date Jun 12, 2014 Client Number 8292

Zelle Hofmann Voelbel & Mason LLP 44 Montgomery Street Suite 3400 San Franciso, CA 94104 fscarpulla@zelle.com jdc@coopkirk.com

Re: LCD Indirect - Project Database 829202 For Professional Services Rendered:					
TIMEKEEPER Greg Brown Rebecca Zoubek Roso Suarez	RZ	96.00	HOURS 0.30 2.50 2.20	FEES 44.10 240.00 418.00	
Total Fees:				702.10	
Total Services				702.10	
Total Expenses				.00	
Total This Matter				702.10	

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Re: LCD Indirect - Pro	829206			
For Professional Services	Rendered	l:		
TIMEKEEPER Danielle Cook Justin Honse Paul Vedder Robin Niemiec Sandra Peters Sondra Weikert Sylvia Nettles	JH PV RN SP SW	RATE 93.00 170.00 147.00 215.00 195.00 147.00 96.00	HOURS 1.40 6.20 1.00 6.90 13.80 14.50	FEES 130.20 1,054.00 147.00 1,483.50 2,691.00 2,131.50 148.80
Total Fees:				7,786.00
Total Services				7,786.00
Total Expenses				.00
Total This Matter				7,786.00

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Re: LCD Indirect - Tec	829207			
For Professional Services	Rendered	l:		
TIMEKEEPER Jason Moberg Lee Anderson Total Fees:		RATE 170.00 147.00	HOURS 0.10 0.50	FEES 17.00 73.50 90.50
Total Services				90.50
Total Expenses				.00
Total This Matter				90.50

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Re: LCD Indirect - Webs	829223			
For Professional Services	Rendered	1:		
TIMEKEEPER Hai Bui Robin Niemiec		RATE 147.00 215.00	HOURS 0.20 0.40	FEES 29.40 86.00
Total Fees:				115.40
Total Services				115.40
Total Expenses				.00
Total This Matter				115.40

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Re: LCD Indirect - Doc	829230			
For Professional Services	Rendered	:		
TIMEKEEPER Mailroom Processor Processor 244 Scan Image Processor Sondra Weikert	244 144	55.00	HOURS 0.24 3.70 0.00 1.50	FEES 13.20 203.50 0.00 220.50
Total Fees:				437.20
Total Services				437.20
Total Expenses				.00
Total This Matter				437.20

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Re: LCD Indirect - Scanning	829231							
For Professional Services Re	For Professional Services Rendered:							
Jace Krause	JK	RATE 55.00 96.00 195.00	5.84	FEES 321.20 5.76 87.75 414.71				
Total Services				414.71				
Total Expenses				.00				
Total This Matter				414.71				

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Inv# 148348 Date Jun 12, 2014 Client Number 8292

829232

For Professional Services	Rendered	:		
TIMEKEEPER Doreen McGinley	DM	RATE 130.00	HOURS 28.40	FEES 3,692.00
Total Fees:				3,692.00

LCD Indirect - Correspondence/Admin Mail

Re:

Total Services 3,692.00

Total Expenses .00
----Total This Matter 3,692.00

tal This Matter 3,692.0

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Re: LCD Indirect - Data C	829234							
For Professional Services Re	For Professional Services Rendered:							
TIMEKEEPER Data Capture Processor Danielle Cook Doreen McGinley Jason Moberg JoAnn Calderin Sondra Weikert	DC DM JM JC	RATE 55.00 93.00 130.00 170.00 93.00 147.00	HOURS 2.14 0.30 29.10 0.40 1.90	FEES 117.70 27.90 3,783.00 68.00 176.70 147.00				
Total Fees:	4,320.30							
Total Services				4,320.30				
Total Expenses				.00				
Total This Matter				4,320.30				

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Re: LCD Indirect - Claims Validation & Audits				829236
For Professional Services	Rendered	:		
TIMEKEEPER Danielle Cook Doreen McGinley JoAnn Calderin Justin Honse Robin Weiss Sandra Peters Sondra Weikert	DM JC JH RW SP	RATE 93.00 130.00 93.00 170.00 93.00 195.00 147.00	4.90 1.90	FEES 10,760.10 1,742.00 2,329.65 833.00 176.70 10,087.35 7,585.20
Total Fees:	33,514.00			
Total Services				33,514.00
Total Expenses				.00
Total This Matter				33,514.00

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Re: LCD Indirect - Deficiency Claim Processing				829237
For Professional Services Rendered:				
TIMEKEEPER Doreen McGinley Lucretia Hassing Sandra Peters Sondra Weikert	LH SP	RATE 130.00 130.00 195.00 147.00	HOURS 4.90 1.08 19.30 22.00	FEES 637.00 140.40 3,763.50 3,234.00
Total Fees:				7,774.90
Total Services				7,774.90
Total Services				1,114.90
Total Expenses				.00
Total This Matter				7,774.90

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Re: LCD Indirect - Ma	ilroom & D	ata Capture	e Management	829239
For Professional Services Rendered:				
TIMEKEEPER Mailroom Processor	151144	RATE 55.00	HOURS 0.79	FEES 43.45
Total Fees:				43.45
Total Services				43.45
Total Expenses				.00
Total This Matter				43.45

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Re: LCD Indirect - Call Center Support				829247
For Professional Services Rendered:				
TIMEKEEPER Danielle Cook Doreen McGinley Rebecca Hensel Robin Weiss Sondra Weikert	DM RH RW	RATE 93.00 130.00 96.00 93.00 147.00	HOURS 2.00 0.70 0.45 0.50 4.70	FEES 186.00 91.00 43.20 46.50 690.90
Total Fees:				1,057.60
Total Services				1,057.60
Total Expenses				.00
Total This Matter				1,057.60

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Inv# 148348 Date Jun 12, 2014 Client Number 8292

Re: LCD Indirect - Expenses

829290

For Professional Services Rendered:

#### Expense Detail:

Reference	Date	Description		Amount
Call	05/29/14 05/31/14 05/31/14 05/31/14 05/31/14	Live Call Center Support Mir Live Call Center Support Mir Long Distance 1040.9 Minutes Conference Calls 198.8 Minut IVR 757.82 Minutes IVR System Charge Line Maintenance Charge Sche	s ces	550.00 124.91 99.40 318.28 275.00 150.00
Posta	05/29/14	l Express Metered Postage; 180 pieces Weekly Mail Pickup Federal Express	Subtotal	86.40 4.33 111.24 201.97
	05/31/14 05/31/14	age Storage and/or Shredding 8 E Storage and/or Shredding 44 Storage and/or Shredding 7 E xing/Printing	Boxes	18.00 99.00 15.75 132.75
Photo		xing/Printing Photocopies/Faxing/Printing	Subtotal	70.30 70.30
Addre	ess Traces 05/31/14	: 12 Undeliverable Notice	Subtotal	6.00 6.00
Webs	ite Hostin	g		

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Inv# 148348 Date Jun 12, 2014 Client Number 8292

05/29/14 Web Monitor & Host

300.00 Subtotal 300.00

Total Expenses 2,228.61

Total This Matter 2,228.61